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TITLE VI PROGRAM UPDATE September 17, 2019

Columbus Consolidated Government Department of Transportation/METRA

Title VI Program FTA C 4702.1B

Columbus Consolidated Government Columbus, Georgia Department of Transportation/METRA

Updated September 2019

COLUMBUS TRANSIT SYSTEM

DEPARTMENT OF TRANSPORTATION

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ROSA EVANS DIRECTOR

August 1, 2019

Ms. Doretha Foster Civil Rights Officer, FTA Region IV Federal Transit Administration U.S. Department of Transportation 61 Forsyth Street, Suite 17T50 Atlanta, Georgia 30303 Phone: (404) 865-5633

email: <u>Doretha.foster@dot.gov</u>

Subject:

2019 Title VI Program for METRA Transit System

Columbus/Muscogee County, Georgia

Dear Ms. Foster:

Please find enclosed the 2019 Title VI Program for METRA Transit System a department of the Columbus Consolidated Government. You may contact me or one of the following persons listed below if you have questions or need any additional information about the program.

Lisa Goodwin, Deputy City Manager Sheila Risper, EEO/AA Officer Columbus Consolidated Government Rick Jones, Director of the Metropolitan Planning Organization Robert Sheridan, METRA Transit Compliance Officer

Sincerely,

Rosa Evans, Director METRA Transit System

: Lisa Goodwin, Deputy City Manager

Sheila Risper, EEO/AA Officer Columbus Consolidated Government

Rick Jones, Director of the MPO

Robert Sheridan, METRA Transit Compliance Officer

A Department Of The Consolidated Government Of Columbus, Georgia

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METRA Transit System FTA Title VI Program Guidelines June 6, 2019

Chapter I – Introduction and Background

METRA Transit System ("METRA"), a Department of the Columbus Consolidated Government (CCG) in Columbus, Georgia is responding to all applicable chapters contained in FTA Circular 4702.1B, published October 1, 2012. The purpose of the circular is to provide recipients of Federal Transit Administration (FTA) financial assistance with guidance and instruction necessary to carry out the U.S. Department of Transportation (DOT's or the "Department") Title VI regulations (49 CFR Part 21) and to integrate into METRA's programs and activities considerations expressed in the Department's Order on Environmental Justice (Executive Order 12898) and Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient ("LEP") (70 FR 74087, December 14, 2005), and legislation authorizing Moving Ahead for Progress in the 21st Century (MAP-21), Public Law 112-141, signed into law on July 6, 2012 and effective October 1, 2012.

Chapter II – Program Overview

1. Program Objectives

- a. The Columbus Consolidated Government/METRA will ensure that the level and quality of its public transportation service is provided in a nondiscriminatory manner.
- b. METRA coordinates with: the Metropolitan Planning Organization (MPO); the Office of Economic Opportunity (EO); the Georgia Department of Labor; the Georgia Department of Human Services; the Homeless Task Force, the Workforce Investment Program; the Regional Valley Planning Commission; the Mayor's Commission on Unity and Diversity; the Hispanic Outreach Committee; area colleges, universities, and secondary schools; the Office of Community Reinvestment; the Program Committee for the Columbus Housing Authority; and other public and private community organizations that represent minority and low-income individuals with the purpose of addressing and reducing the adverse human health and environmental impacts of public transportation as well as the social and economic effects of public transportation programs and activities. These organizations work in concert with Columbus Consolidated Government/METRA to promote full and fair participation in public transportation decision-making without regard to race, color or national origin.



c. METRA is committed to ensuring meaningful access to transit-related programs, information, activities, and services by persons with limited English proficiency.

2. Statutory Authority

METRA upholds the Title VI, Section 601 precept which states:

"No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."

This applies to contracts, operations, program activities, the operations of the Department of Transportation/METRA, special events, or any entity that is affiliated with METRA and benefits from federal funds. These programs and activities will be administered in a nondiscriminatory manner.

3. Regulatory Authority

METRA programs receiving financial assistance from FTA are subject to Title VI of the Civil Rights Act of 1964 (42 U.S.C.) 20000d) and the DOT's implementing regulations. In addition, METRA is also subject to the Department of Justice's ("DOJ") Title VI implementing regulations found in 49 CFR part 21.

4. Additional Documents

- a. METRA adheres to the Department's Policy Guidance and our responsibility to the Limited English Proficiency (LEP) Program, 70 FR 74087, (December 14, 2005). The guidance is based on the prohibition against national origin discrimination in Title VI of the Civil Rights Act of 1964, as it affects limited English proficient persons.
- b. METRA has followed the Department's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient Persons ("DOT LEP Guidance"), 70 FR 74087, (December 14, 2005). This guidance is based on the prohibition against national origin discrimination in Title VI of the Civil Rights Act of 1964. The LEP program is described in full on Chapter V of the Title VI Program.
- c. METRA includes in contracts the provision of 49 U.S.C. Section 5332, which prohibits discrimination on the basis of race, color, creed, national origin, sex, or age and prohibits discrimination in employment or business opportunities.

5. Reporting Requirements

METRA submits to FTA a Title VI Program update every three years in compliance with 49 CFR Section 21.9(b). FTA will make determinations on deficiencies; these areas are reviewed,

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and corrective actions will be implemented. Subrecipients of funding (METRA has no subrecipients of funding at this time) are required to provide the same compliance reports and to follow the same timelines required by the fund recipient.

6. Applicability to Contractors

Contractors and sub-contractors (METRA has no contractors and subcontractors at this time) are responsible for complying with METRA's Title VI Program. METRA Transit System will be responsible for ensuring that contractors follow the Title VI Program and comply with Title VI regulations.

Chapter III - General Requirements and Guidelines

1. <u>Introduction</u>. This chapter is a description of all FTA recipient requirements that METRA must follow to ensure that its programs, policies, and activities comply with the Department of Transportation's (DOT) Title VI regulations.

2. Requirement to Provide Title VI Assurances

METRA assures that, in accordance with 49 CFR Section 21.7(a), the grantee will carry out its program in compliance with Title VI of the Civil Rights Act of 1964. This requirement is attested to annually by the submission of METRA's Certifications and Assurances to FTA. See Appendix A.

3. Requirement for First – Time Applicants

This section and its summary provisions are not applicable to METRA. METRA is not a first-time applicant.

4. Requirement to Prepare and Submit a Title VI Program

In compliance with Title 49 CFR Section 21.9(b), METRA keeps and submits completed and prepared documents every three years to the Federal Transit Administration's Region IV Office of Civil Rights Administrator.

- a. Contents. METRA's Title VI Program will include the following contents:
 - (1) A copy of METRA's Title VI notice to the public that indicates METRA's compliance with Title VI and informs members of the public of the protections against discrimination afforded to them by Title VI. A list of locations where the notice is posted is also included. See Appendix B.
 - (2) A copy of METRA's instructions to the public on how to file a Title VI discrimination complaint, including a copy of the complaint form. See Appendix C.
 - (3) A list of any public transportation-related Title VI investigations, complaints, or lawsuits filed with METRA since the last submission of its Title VI Program. No complaints or lawsuits were filed during the previous three years of the Title VI Program. See Appendix D.

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- 4.) A summary of the public outreach and involvement activities undertaken since the last submission and a description of steps taken to ensure that minority and low-income people have meaningful access to these activities.
- 5.) A copy of METRA's LEP plan for providing language assistance for persons with limited English proficiency. See Appendix E.
- 6.) A table depicting the racial breakdown of the membership of the transit-related, nonelected planning boards, advisory councils or committees, or similar bodies, and a description of efforts made to encourage the participation of minorities on such committees. See Appendix F.
- 7.) This is not applicable to METRA. METRA does not have subrecipients.
- 8.) This is not applicable to METRA. METRA has not constructed a facility since the last Title VI Program update in 2016.
- 9.) If applicable, METRA will provide any additional information specified in chapters IV, V, and VI.
- b. <u>Upload Title VI Program to TrAMS.</u> METRA will upload its Title VI Program into FTA's Transit Award Management System (TrAMS) no later than sixty calendar days prior to the date of expiration of its Title VI Program.
- c. <u>Determinations</u>. The status of METRA's Title VI Program will be noted in TrAMS. The three status determinations are:
 - (1) <u>Concur.</u> This status indicates that the recipients' Title VI Program meets the requirements as set out in FTA Circular 4702.1B. The recipient may receive grant funds.
 - (2) <u>In review</u>. This status indicates that the recipient's Title VI Program is being reviewed by FTA staff and a determination as to sufficiency has not yet been made. "In review" status is only effective for sixty days and grants may be processed while a Title VI Program has an "in review" status.
 - (3) Expired/Expiration. This status indicates that the recipients' Title VI Program has expired and that an updated Title VI Program must be submitted. A recipient with an expired Title VI Program may have its draw-down privileges suspended and grants may not be processed.
- d. <u>Reporting Requirement Exemptions</u>. Reporting exemptions do not apply to METRA. METRA does not receive exclusive FTA funding through the University Transportation Center Program, National Research and Technology Program, Transportation, Over the Road Bus Accessibility Program, or Public Transportation on Indian Reservations Program.

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- 5. <u>Requirement to Notify Beneficiaries of Protection Under Title VI.</u> In compliance with 49 CFR Section 21.9(d), METRA provides Title VI information to the public regarding protections against discrimination.
 - a. Contents. The Title VI Notice shall include:
 - 1. A statement that METRA operates programs without regard to race, color, or national origin.
 - 2. A description of METRA's procedures that members of the public should follow in order to request additional information on its Title VI obligations.
 - 3. A description of the procedure that members of the public shall follow in order to file a Title VI discrimination complaint against METRA.
 - b. <u>Effective Practices for Fulfilling the Notification Requirement.</u>
 - 1. <u>Dissemination</u>. METRA will inform the public of their rights under Title VI through postings of the Title VI notice on posters, comment cards, or flyers. The Title VI notice is posted and will continue to be posted at stations, in transit vehicles, and on METRA's official website. METRA will also publish the notification in local newspapers [See Appendix H].
 - 2. <u>Document translation.</u> METRA will provide notices detailing Title VI obligations and complaint procedures and will translate these notices into languages other than English, as needed and consistent with the DOT LEP Guidance and METRA's language assistance plan.
 - 3. <u>Sub-Recipients.</u> This section is not applicable to METRA. METRA currently does not have sub-recipients.
- 6. Requirement To Develop Title VI Complaint Procedures And Complaint Form. METRA, in compliance with 49 CFT Section 21.9(b), has developed procedures for Title VI complaints and the investigation of Title VI complaints. The complaint process and complaint form are made available upon request. The complaint process and complaint form are also made available on METRA's website.
- 7. Requirement To Record and Report Transit-Related Title VI Investigations, Complaints, and Lawsuits. In compliance with 49 CFR Section 21.9(b), METRA maintains a list of all active complaints and lawsuits alleging discrimination on the basis of race, color, or national origin. The list includes:
 - 1.) The date that the investigation, lawsuit, or complaint was filed;
 - 2.) A summary of the allegation(s);

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- 3.) The status of the investigation, lawsuit, or complaint; and
- 4.) A description of the action(s) taken in response or the final findings related to the investigation, lawsuit, or complaint.

8. <u>Promoting Inclusive Public Participation.</u>

METRA will seek out and include early and continuous community outreach activities. The viewpoint of minority, low-income, and Limited English Persons in the development, planning, and implementation of transportation decisions and activities is important to the overall achievement of transit services and goals. METRA will encourage and consider the viewpoints of minority and low-income people in public transportation involvement planning, programs, and decisions. Actions will include the following:

- a. Using locations, facilities, and meeting times that are convenient and accessible to low-income and minority communities.
- b. Using different meeting sizes or formats or varying the type and number of news media used to announce public participation opportunities, so that communications are tailored to a particular community or population.
- c. Coordinating with individuals, institutions, and organizations and implementing community-based public involvement strategies to reach out to members in affected minority and/or low-income communities.
- d. Providing opportunities for public participation through means other than written communication, such as personal interviews or the use of audio recording devices to capture oral comments.
- e. The consideration of using radio, television, and newspaper ads on stations and in publications that serve LEP populations.

9. Requirement to Provide Meaningful Access to Limited English Persons (LEP)

The Columbus Consolidated Government and METRA take an active and decisive role in insuring that programs are consistent with Title VI of the Civil Rights Act of 1964, DOT's implementing regulations, and Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency" (65 FT 50121, Aug 11, 2000). METRA will take reasonable steps to ensure meaningful access to benefits, services, information, and other important portions of programs and activities for individual who are Limited English Proficient. LEP persons will be afforded every opportunity to participate in transportation planning as well as all transit services, programs, decision-making processes, and activities. The LEP program is outlined in Appendix E.

a. <u>Four Factor Analysis</u>. METRA will ensure meaningful access to programs and activities by using the Four Factor Analysis to determine the specific language services that are appropriate to provide. The following four factors of the assessment are:

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- 1. The analysis will identify the number or proportion of LEP persons eligible to be served or likely to be encountered by the program and METRA. The analysis will also include the following:
 - (a) How LEP persons interact with METRA;
 - (b) Identification of LEP communities, and assessing the number or proportion of LEP persons from each language group to determine the appropriate language services for each language group;
 - (c) The literacy skills of LEP populations in their native languages, in order to determine whether translation of documents will be an effective practice; and
 - (d) Whether LEP persons are underserved by METRA due to language barriers.
- 2. The frequency with which LEP persons come into contact with the program will be determined by surveying key program areas and assessing major points of contact with the public, such as:
 - (a) Use of bus and rail service (METRA does not operate a rail service);
 - (b) Purchase of passes and tickets through vending machines, outlets, websites, and over the phone;
 - (c) Participation in public meeting;
 - (d) Customer service interactions;
 - (e) Ridership surveys;
 - (f) Operator surveys.
- 3. Determining the nature and importance of the program, activity, or service provided by METRA to people's lives in order to ensure meaningful access to LEP persons. This will be accomplished by METRA through facilitated meetings with LEP persons. Meetings will be held to receive information on what the local LEP population considers to be an essential program, activity, or service. Meetings will also help determine the effective means used to provide language assistance.
- 4. METRA will ensure that any resource limitations will be well substantiated before limiting the resources available for LEP outreach and the costs associated with that outreach.



b. <u>Developing a Language Assistance Plan</u>.

After completing the Four Factor Analysis, METRA shall use the results of the analyses to determine which language assistance services are appropriate. Additionally, METRA shall develop an assistance plan to address the identified needs of the LEP population(s) it serves.

METRA's LEP Plan shall, at a minimum:

- (a) Include the results of the Four Factor Analysis, including a description of the LEP population(s) served;
- (b) Describe how the recipient provides language assistance services by language;
- (c) Describe how the recipient provides notice to LEP persons about the availability of language assistance;
- (d) Describe how the recipient monitors, evaluates and updates the language access plan; and
- (e) Describe how the recipient trains employees to provide timely and reasonable language assistance to LEP populations.

c. Safe Harbor Provision.

METRA will use the Department of Justice's Safe Harbor Provision for determining the circumstances of providing a "safe harbor" for translations of written materials for LEP populations. If a LEP population constitutes 5% or 1,000 persons, whichever is less, of the total population of persons eligible to be serviced or likely to be affected or encountered, then such action will be considered strong evidence to warrant LEP specific translation services. Translation of non-vital documents, if needed, will be provided orally. If there are fewer that 50 persons in the language group that does not reach the 5% trigger, then METRA will provide translations services as needed. Primary language notices will be available free of cost to LEP persons in the 5% or greater group.

Safe harbor provisions apply to the translation of written documents only. These provisions do not affect the requirement to provide meaningful access to LEP individuals through oral interpreters where oral language services are needed and are reasonable. If it is determined that the language group has other barriers to reading written interpreted documents, oral interpretation will be considered as an effective alternative in this instance.





10. Minority Representation on Planning and Advisory Bodies.

METRA assures that, in accordance with Title 49 CFR Section 21.5(b)(1)(vii), it does not on the grounds of race, color, or national origin, "deny a person the opportunity to participate as a member of a planning, advisory, or similar body which is an integral part of the program." A table depicting the racial breakdown of the membership of transit-related, non-elected planning boards, advisory councils or committees and encourage participation of minorities on such committees is provided. See Appendix F.

- 11. <u>Providing Assistance To Sub-Recipients.</u> This section is not applicable to METRA. METRA does not have sub-recipients at this time.
- 12. <u>Monitoring Sub-Recipients.</u> This section is not applicable to METRA Transit System. METRA does not have sub-recipients at this time.
- 13. Determination of Site or Location of Facilities.

METRA will comply with Title 49 CFR Section 21.9(b)(3). Title 49 CFR Section 21.9(b)(3) states that, "In determining the site or location of facilities, a recipient or applicant may not make selections with the purpose or effect of excluding persons from, denying them the benefits of, or subjecting them to discrimination under any program to which this regulation applies, on the grounds of race, color, or national origin; or with the purpose or effect of defeating or substantially impairing the accomplishment of the objectives of the Act or this part." Title 49 CFR part 21, Appendix C, Section (3)(iv) provides, "The location of projects requiring land acquisition and the displacement of persons from their residences and businesses may not be determined on the basis of race, color, or national origin." In order to comply with the regulations:

- a. A Title VI equity analysis will be completed during the planning stage with regard to where a project is located or sited to ensure the location is selected without regard to race, color, or national origin. METRA will engage in outreach to persons potentially impacted by the sitting of facilities and compare the Title VI equity impacts of various site alternatives before the selection of the preferred site.
- b. An evaluation will be done for the locations of facilities; and attention will be given to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result. An analysis will be done at the Census track or block group where appropriate to ensure that proper perspective is given to localized impacts.
- c. If METRA determines that the location of a project will result in a disparate impact on the basis of race, color, or national origin, the project will only be located in that location if there is a substantial legitimate justification for locating the project there, and where there are no alternative locations that would have a less disparate impact on the basis of race, color, or national origin. METRA will show how both tests are met; and will consider and analyze alternatives to determine whether those alternatives would have less of a disparate

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impact on the basis of race, color, or national origin, and then implement the least discriminatory alternative.

14. Requirement To Provide Additional Information Upon Request.

METRA makes available and provides upon request additional information and assistance regarding Title VI information and access.

Chapter IV Requirements And Guidelines For Fixed Route Transit Providers

- 1. <u>Introduction.</u> This chapter provides a description of program specific guidance for recipients who provide fixed route public transportation (also referred to as transit providers) and receive Federal financial assistance, inclusive of states, local and regional entities, and public and private entities. METRA ensures compliance with the general requirements in Chapter III of FTA C 4702.1B. METRA does not meet the threshold of Operating 50 or more fixed route vehicles in peak service and located in an Urbanized Area (UZA) of 200,000 or more in population. METRA will submit a Title VI program in compliance with DOT Title VI regulations; to which the degree of evidence a fixed route transit provider must provide to demonstrate compliance with the regulations.
- 2. <u>Implementation</u>. METRA assures compliance with the reporting requirements of FTA Circular, 4702.1B with the submission of a Title VI Program.
 - a. This section does not apply to METRA. METRA does not operate 50 or more fixed route vehicles in peak service and is located in an Urbanized Area (UZA) of 200,000 or more in population.
 - b. METRA assures compliance with the reporting requirements of FTA Circular, 4702.1B.
 - c. <u>Service Equity Analysis</u>. This section does not apply to METRA. METRA does not operate 50 or more fixed route vehicles in peak service and is located in an Urbanized Area (UZA) of 200,000 or more in population.
 - d. <u>Surveys.</u> This section does not apply to METRA. METRA does not operate 50 or more fixed route vehicles in peak service and is located in an Urbanized Area (UZA) of 200,000 or more in population.

3. Requirement to Prepare and Submit a Title VI Program

In compliance with 49 CFR Section 21.9(b), FTA requires that the recipient, to which Chapter IV applies, document their compliance with the program-specific requirements in 1 and 2 of the chapter and submit to FTA's Regional Civil Rights Officer a Title VI program that also includes documentation of compliance with the general reporting requirements in Section 1 through 14 of Chapter III. The program is to be submitted once every three years on or prior to a date arranged by FTA.

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- a. <u>Contents of the Title VI Program.</u> Providers of fixed route public transportation shall include the following information.
 - (1.) As a fixed route transit provider, METRA shall submit:
 - (a) All general requirements set out in Section 4 of Chapter III of FTA C 4702.1B
 - (b) System-wide service standards and system—wide service policies, whether existing or new as described in this chapter.
 - (2.) This section is not applicable to METRA. METRA does not operate 50 or more fixed route vehicles in peak service and is located in an Urbanized Area (UZA) of 200,000 or more in population.
- 4. Requirement to set System-Wide Service Standards and Policies

In compliance with 49 CFR Section 21.5(b)(2), 49 CFR Section 21.5(B)(7), and Appendix C to 49 CFR part 21, METRA has adopted a quantitative system-wide service standard necessary to guard against discriminatory service design or operational decisions.

a. Effective Practices that Fulfill the Service Standard Requirement

(1.) Vehicle Load

The load factor policy for METRA is defined as a person to seat ratio, recorded on the routes, that exceeds 1:1.5. A vehicle load that exceeds this will prompt consideration for increasing service.

(2.) Vehicle Headway

METRA's fixed route vehicle headways vary in response to vehicle load factor determination and in response to other factors such as: current economic trends (recession, unemployment rates); demographic trends (seniors, daily workers, disabled and students); seasonal variations (students on summer vacation, college quarterly breaks, Christmas holiday shopping) and special or extraordinary events (after Hurricane Katrina, Columbus hosted numerous evacuees). METRA operates on a pulse bus system. This means that line ups are timed so that customers can transfer from one bus directly to another bus. The headways for buses are 30 minutes to 60 minutes, with buses leaving the transfer center on the hour and half hour. The number of buses on each route determines the headway. [Please see next page for fixed route bus requirements].





METRA 2019 Fixed Route Bus requirements

Route	Weekday Peak Hr	Weekday Off-Peak	Saturday
1- E Wynnton	1	1	1
2- Cusseta Road & 4- Fort Bennin	g 3	3	3
3- St. Mary's Road	2	2	2
5- N Highland & 7- Columbus Sou	uth 6	3	3
6- Columbus State	2	2	2
9- Bradley Park & Airport Thruwa	ay 2	2	2
12- Veterans Parkway	1	1	1

^{*}Please note that Route 2 and Route 4 interline together, Route 5 and Route 7 interline together, and Route 9 and Route 10 interline together.

(3.) On-Time Performance

On-time performance is monitored manually by noting the times that buses arrive into the Transfer Center during: scheduled line-ups, on-line supervisor checks, and supervisor ride checks. All revenue vehicles are equipped with 800 MHz radio systems to communicate to dispatch delays, incidents, accidents, trains and other on-time performance indicators. METRA has an Automatic Vehicle Location (AVL) ITS systems that allows for central monitoring of all buses on all routes in real time. The AVL system reduces the relay time for assistance to buses with on-time issues.

	Weekday	Weekday	
Route	Peak Hour	Off Peak Hour	Saturdays
1. East Wynnton	1	1	1
2.Cusseta Road	3	3	3
4. Fort Benning			
3. St. Mary's Road	2	2	2
5. North Highland	6	3	3
7. Columbus South			
6. Columbus State	2	2	2
9. Bradley Park	3	3	3
10. Airport Thruway			
12. Veterans Parkway	1	1	1

^{*}Please note that Route 2 and Route 4 interline together, Route 5 and Route 7 interline together, and Route 9 and Route 10 interline together.

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METRA monitors the arrival and departure times for every bus on every route. Buses arrive or

Trips	Reported Late Arrivals & Departures	Percentage	
23,812	19	0.08%	

depart more than five minutes beyond their scheduled arrival or departure are considered late and are recorded. Overall, travel time delay was not found to be significant for the transit authority. In the first five months of 2017 (January through May), METRA operated 23,812 total weekday trips and weekend trips. Less than 1% of buses were reported as arriving or departing to METRA Transit's Transfer Center more than five minutes from their scheduled arrival or departure time. The average delay for late buses was 3 to 5 minutes. The most commonly cited causes for arrival or departure tardiness by staff was peak hour congestion, equipment failure, traffic accidents, train delays, weather, and unexpected construction delays along specific routes.

(4.) Service Availability

METRA maintains service viability and availability by: reviewing daily GFI data reports, conducting GDOT surveys of ridership, annual customer surveys, customer comments cards (which are made available at all times), anecdotal information provided by customers and bus operators, participation on transportation and planning committees, attending community outreach activities and forums, attending quarterly citywide "Talk to the Mayor" forums for public citizens, maintaining an open dialogue with area agencies (economic, social, commercial), and keeping abreast of economic and social trends that affect ridership (i.e., fuel prices, city wide furloughs). Bus stops, shelters, routes, and service distribution are based on reaching the most customers by way of trip origin and trip destination. Bus stops and shelters are placed along routes so that all riders can realize the maximum benefit in terms of safety and convenience.

METRA provides daily transportation to major destinations in the service area; including work locations, industrial parks, recreation centers, public pools, colleges, schools, hospitals, doctors' offices, specialized clinics such as dialysis clinics, social service agencies, commercial and retail centers, restaurants, and other important locations in the community. Complementary paratransit service is provided on-demand within a ¾ mile radius of the fixed route service area.

b. Effective Practices to Fulfill the Service Policy Requirement

(1.) <u>Distribution of Transit Amenities</u>

METRA has 55 bus shelters and 975 bus stops system wide. The customer Transfer Center is adjacent to the Maintenance Building and is within the same block as the administration building. This is a "one stop shop" campus concept. The entire METRA Transit System campus is located: within the Central Business District (CBD) of the City, within a two-block radius of two Regional Healthcare facilities (the two primary care hospitals in the area), near the State Health and Human Resources Building, within a 1-mile radius of the City Government Center, and within a 2-mile radius of utility companies. The Customer Transfer Center has covered bays for each route and there is an indoor, climate-controlled waiting area for customers. There is also an outdoor customer

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area, bathrooms, ticket vending machines, bus schedules, customer information, and a staffed customer service and dispatch office. Bus stops are equipped with trashcans and benches. All fixed route buses are low-flow and paratransit buses are lift equipped. Buses are also equipped with 6-8 video cameras, fareboxes, 800 MHZ radios, emergency alert buttons, and automatic enunciation systems.

METRA Transit System manages four park-and-ride locations in total. Three park-and-ride locations (2 garages and 1 surface lot) are located within the CBD. METRA Transit System also manages an additional park-and-ride garage at the City Services Center in midtown Columbus. These park-and-ride locations are in an advantageous setting due to ongoing economic and redevelopment activities within the CBD, which has led to a resurgence of small and large businesses. Restaurants and other small and large businesses are located in the CBD. An expansion of Columbus State University's downtown campus continues, bringing students, faculty, and staff to CBD. CBD also has the world's largest whitewater rafting recreation venue along the Chattahoochee River. All of this activity, coupled with limited on-street parking, makes our garages and surface lot an advantageous setting for park-and-rides. Public transit amenities are widespread and available to all customers. The following is a list of the four locations along with the location's official address:

- -RiverCenter Parking Garage 919 Broadway, Columbus GA 31901
- -Bay Ave. Parking Garage 12 W 12th St., Columbus GA 31901
- -Citizens Service Center 3111 Citizens Way, Columbus, GA 31906
- -9th St. Parking Lot (Across from the Government Center) 100 E 10th St, Columbus, GA 31901

(2.) Vehicle Assignment

METRA has a fleet of 45 buses to provide service on 10 fixed routes and service within our paratransit area of operations. Our paratransit services operate along a 3/4 of a mile corridor located on each side of all fixed bus routes and in a 3/4 of a mile radius around each station. METRA's hours of operation are Monday through Saturday, from 4:30 am to 11:30 pm. METRA directly operates all transportation services. Bus assignments are made based on the service demands, as determined by fixed route and paratransit customer ridership data and reports.

5. Requirement To Collect And Report Demographic Data

In compliance with 49 CFR Section 21.9(b), METRA utilizes a combination of elements from Option A (GIS Census Mapping) and Option B (annual customer surveys) to determine and demonstrate the extent in which members of minority groups are beneficiaries of METRA's FTA funded programs.

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Note: Transit systems meeting the threshold of operating 50 or more buses in peak service and operate in an Urbanized Area (UZA) of 200,000 or more must collect and report demographic data. METRA does not meet this threshold. METRA is, however, voluntarily reporting relevant data in category "a" to facilitate transparency and good practices.

a. Demographic and Service Profile Maps and Charts

METRA does not meet the threshold that requires it to report demographic and service profile maps to FTA. METRA submits this information voluntarily. The City of Columbus' GIS division prepares METRA Transit's system maps. These maps overlay METRA's routes onto the 2013-2018 demographic estimates from the US Census Bureau's American Community Survey for METRA's service area, Muscogee County, Georgia. The Census block group data is indicated by shading (grey to pale) on the map. These maps allow us to determine METRA's demographic profile needs and service delivery needs within its service area. Demographic maps are located in Appendix G of the Title VI Program.

Map "1"- Persons age 18 to 64 (percent of the total)

Map "2" – Persons over age 65 (percent of total)

Map "3" – Households with 0-1 vehicles

Map "4" -Households with One or More Disabled Persons

Map "5" - Employed Persons/Labor Force Participation Rate

Map "6" – Hispanic Population

Map "7" – Poverty by Census Tract/ Population Below Poverty

Map "8" – Total Persons per square mile

Map "9" – Percentage of Non-white Population

Map "10" – Total Population Under 18 Years of Age (as a percent of total)

b. Demographic Ridership and Travel Patterns

METRA does not meet the threshold to report demographic ridership and travel patterns. METRA collects any relevant data through GFI survey reports and annual passenger survey tabulations.

6. Requirement to Monitor Transit Service

This section is not applicable to METRA. METRA does not meet the threshold of operating 50 or more buses in peak service and operating in an Urbanized Area (UZA) of 200,000 or more.

7. Requirement to Evaluate Service and Fare Changes.

This section is not applicable to METRA. METRA does not meet the threshold of operating 50 or more buses in peak service and operating in an Urbanized Area (UZA) of 200,000 or more.

(a). Service Equity Analysis

This section is not applicable to METRA. METRA does not meet the threshold of operating 50 or more buses in peak service and operating in an Urbanized Area (UZA) of 200,000 or more.

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Chapter V Requirements for States

This chapter provides program information for State DOTs and other State administering agencies. It does not apply to this submission by METRA.

<u>Chapter VI Requirements for Metropolitan Transportation Planning Organizations</u>

This chapter outlines requirements for Metropolitan Transportation Planning Organizations (MPOs) and does not apply to this submission by METRA.

Chapter VII Effecting Compliance With DOT Title VI Regulations

This chapter describes FTA procedures to be taken when noncompliance or threatened noncompliance cannot be corrected by informal means. This section does not apply to this program submission.

Chapter VIII Compliance Reviews

A Title VI compliance review has not been conducted; this section does not apply to this program submission.

Chapter IX Complaints

Chapter description of how FTA responds to complaints of discrimination under Title VI against a recipient. This section does not apply to this program submission.



Appendix

Title VI Program METRA Transit System

APPENDIX A

Certifications and Assurances APPENDIX A

FTA FISCAL YEAR 2019 CERTIFICATIONS AND ASSURANCES

FEDERAL FISCAL YEAR 2019 CERTIFICATIONS AND ASSURANCES FOR FTA ASSISTANCE PROGRAMS

(Signature pages alternate to providing Certifications and Assurances in TrAMS.)

Name of Applicant: Columbus Consolidated Government

The	Applicant certifies to the applicable provisions of categories 01–18.	···
	Or,	
The A	Applicant certifies to the applicable provisions of the categories it has	as selected:
Cate	egory	Certification
01	Certifications and Assurances Required of Every Applicant	
02	Tax Liability and Felony Convictions	
03	Lobbying	
04	Private Sector Protections	
05	Transit Asset Management Plan	
06	Rolling Stock Buy America Reviews and Bus Testing	
07	Urbanized Area Formula Grants Program	
08	Formula Grants for Rural Areas	
09	Fixed Guideway Capital Investment Grants and the Expedited Project Delivery for Capital Investment Grants Pilot Program	
10	Grants for Buses and Bus Facilities and Low or No Emission Vehicle Deployment Grant Programs	
11	Enhanced Mobility of Seniors and Individuals with Disabilities Programs	
12	State of Good Repair Grants	
13	Infrastructure Finance Programs	
14	Alcohol and Controlled Substances Testing	
15	Rail Safety Training and Oversight	
16	Demand Responsive Service	
17	Interest and Financing Costs	\ <u>'</u>

Construction Hiring Preferences

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FEDERAL FISCAL YEAR 2019 FTA CERTIFICATIONS AND ASSURANCES SIGNATURE

PAGE
(Required of all Applicants for federal assistance to be awarded by FTA in FY 2019)

AFFIRMATION OF APPLICANT

Name of the Applicant: Columbus Consolidated Grovernent
BY SIGNING BELOW, on behalf of the Applicant, I declare that it has duly authorized me to make these Certifications and Assurances and bind its compliance. Thus, it agrees to comply with all federal laws, regulations, and requirements, follow applicable federal guidance, and comply with the Certifications and Assurances as indicated on the foregoing page applicable to each application its Authorized Representative makes to the Federal Transit Administration (FTA) in federal fiscal year 2019, irrespective of whether the individual that acted on his or her Applicant's behalf continues to represent it.
FTA intends that the Certifications and Assurances the Applicant selects on the other side of this document should apply to each Award for which it now seeks, or may later seek federal assistance to be awarded during federal fiscal year 2019.
The Applicant affirms the truthfulness and accuracy of the Certifications and Assurances it has selected in the statements submitted with this document and any other submission made to FTA, and acknowledges that the Program Fraud Civil Remedies Act of 1986, 31 U.S.C. § 3801 et seq., and implementing U.S. DOT regulations, "Program Fraud Civil Remedies," 49 CFR part 31, apply to any certification, assurance or submission made to FTA. The criminal provisions of 18 U.S.C. § 1001 apply to any certification, assurance, or submission made in connection with a federal public transportation program authorized by 49 U.S.C. chapter 53 or any other statute
In signing this document, I declare under penalties of perjury that the foregoing Certifications and Assurances, and any other statements hade by me on behalf of the Applicant are true and accurate. Signature
For (Name of Applicant): Columbius, Georgia Consolidated Government
As the undersigned Attorney for the above-named Applicant, I hereby affirm to the Applicant that it has authority under state, local, or tribal government law, as applicable, to make and comply with the Certifications and Assurances as indicated on the foregoing pages. I further affirm that, in my opinion, the Certifications and Assurances have been legally made and constitute legal and binding obligations on it.
I further affirm that, to the best of my knowledge, there is no legislation or litigation pending or imminent that might adversely affect the validity of these Certifications and Assurances, or of the performance of its FTA assisted Award.
Signature Tay City Atterney Date: 6/5/19
NameAttorney for Applicant
Each Applicant for federal assistance to be awarded by FTA must provide an Affirmation of Applicant's Attorney

pertaining to the Applicant's legal capacity. The Applicant may enter its electronic signature in lieu of the Attorney's signature within TrAMS, provided the Applicant has on file and uploaded to TrAMS this hard-copy

Affirmation, signed by the attorney and dated this federal fiscal year.

APPENDIX B

METRA Transit System Title VI Public Notice to the Public (General Requirements)

APPENDIX B

METRA Transit System Title VI Public Notice to the Public (General Requirements)

Notifying the Public of Rights Under Title VI The Columbus Consolidated Government – Department of Transportation/METRA

- The City of Columbus/METRA operates its program and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the City of Columbus/METRA.
- For more information on the City of Columbus/METRA's civil rights program, and the procedures to file a complaint, contact (706) 225-4581, or mail completed forms to: METRA: Attn: Title VI; PO Box 1340; Columbus, GA 31901. For more information, visit https://www.columbusga.gov/metra/.
- A complainant may file a complaint directly with the Federal Transit Administration at any time by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.
- If information is needed in another language, contact (706) 225-4581
 - Si se necesita informacion en otro idoma, llame (706) 225-4581
 - o Si l'information est necessaire dans une autre langue, contactez (706) 225-4581

The Title VI notice is posted at:

- METRA's campus located at 814 Linwood Blvd. in Columbus, GA.
- Inside all buses and appropriate structures operated by METRA.
- The notice, along with METRA's Title VI Program can be found posted online at: https://www.columbusga.gov/metra/TitleVI.htm





APPENDIX C

METRA Transit System Title VI Public Notice of Rights and Complaints Process

APPENDIX C

METRA Transit System Title VI Public Notice of Rights and Complaints Process

METRA Transit System

A Department of the Consolidated Government of Columbus, Georgia

TITLE VI PUBLIC NOTICE OF RIGHTS AND COMPLAINT PROCESS

Public Notice of Rights

The following statement shall be posted on site at METRA and displayed on public transit vehicles; and other appropriate materials made available to the public. Translation of all materials is available upon request.

Non-Discrimination - Your Rights Under Title VI of the Civil Rights Act of 1964

The United States Department of Transportation (DOT) ensures full compliance with Title VI of the Civil Rights Act of 1964 by prohibiting discrimination against any person on the basis of race, color or national origin in the provisions of benefits and services resulting from federally assisted programs and activities. Any person, who believes their rights have been violated, should contact METRA Transit System at 706 225-4582. Title VI policy and complaint procedures shall be made available upon request by contacting METRA. For Federal Title VI information please contact the Federal Transit Administration (FTA), Region IV at 404 562-3528. Federal Title VI information, including filing complaints, can also be accessed on the FTA web site at:"

Title VI is a section of the Civil Rights Act of 1964 which states: "No person in the United States shall on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.

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Title VI Information and METRA's Complaint Process maybe obtained upon request

The Columbus Consolidated Government/METRA Transit System, grants to all citizens equal access to all its transportation services. It is further intended that all citizens are made aware of their rights to such access. Information and materials are designed as educational tools that will increase the understanding of civil rights laws that protect the benefits of Title VI of the Civil Rights Acts of 1964 and the services provided by public transportation in Columbus.

METRA's Title VI Complaint and Investigation Process

Purpose of the Process: The complaint process was developed to cover all complaints filed under Title VI of the Civil Rights Act of 1964, for alleged discrimination in any program or activity administered by METRA.

The complaint procedure does not deny the right of the complainant to file formal complaints with other State or Federal agencies, such as the Federal Transit Administration (FTA), or to seek private counsel for complaints alleging discrimination. Every effort will be made to obtain early resolution of complaints at the lowest level possible.

The option of a meeting between the affected party and METRA may be utilized for resolution. Any individual, group of individuals or entity that believes they have been subjected to discrimination prohibited under Title VI and related statutes may file a complaint.

Resolution of Title VI Complaints:

1) A formal complaint must be filed within 180 days of the alleged occurrence. Complaints are to be in writing and signed by the individual or his/her representative, and will include the complainant's name, address and telephone number; name of alleged discriminating official, basis of complaint, and the date of alleged act. A statement detailing the facts and circumstances of the alleged discrimination must accompany the complaint. Resolutions to complaints are most likely when they are immediately brought to the attention of METRA Administration. Timely filing of complaint leads to timely resolution.

METRA's complaint form is available online by clicking on the link entitled "Title VI Complaint Form" that is available at https://www.columbusga.gov/metra/TitleVI.htm. Complainants may also view a description of the complaint procedure by clicking on the link entitled "Title VI Complaint Process Explanation."

Individuals are encouraged to use the form when filing official complaints. Complaint forms should be sent to:



METRA Attn: Title VI PO Box 1340 Columbus, Georgia 31906

- 2) In the case where a Complainant is unable or incapable of providing a written statement, a verbal complaint of discrimination may be made to the METRA's Civil Rights Officer. Under these circumstances, the Complainant will be interviewed, and the Civil Rights Officer may assist the complainant in writing the allegation.
- 3) When a complaint is received, METRA will provide written acknowledgment to the Complainant, within ten (10) days by registered mail.
- 4) If a complaint is incomplete, additional information may be requested, and the Complainant will be provided 60 business days to submit the required information. Failure to do so may be considered good cause for a determination of no investigative merit.
- Within 15 business days from receipt of a completed complaint, METRA will determine its jurisdiction in pursuing the matter and whether the complaint has sufficient merit to warrant an investigation. Within (10) days of this decision, the METRA Director will notify the Complainant and Respondent, by registered mail, informing them of the disposition.
 - a. If the decision is not to investigate the complaint, the notification shall specifically state the reason for the decision.
 - b. If the complaint is to be investigated, the notification shall state the grounds of the METRA's jurisdiction, while informing the parties that their full cooperation will be required in gathering additional information and assisting the investigator.
- 6) When METRA does not have sufficient jurisdiction, METRA's Director may refer the complaint to the appropriate agency with the appropriate jurisdiction (i.e., State or Federal agency).
- 7) If the complaint has investigative merit, the complaint will be fully investigated. A complete investigation will be conducted, and an investigative report will be submitted to METRA's Director within 60 days from receipt of the complaint. The report will include a narrative description of the incident, summaries of all persons interviewed, and a finding with recommendations and conciliatory measures where appropriate. If the investigation is delayed for any reason, the Complainant will be notified of the extension and the reason.

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- 8) The Director will issue letters of finding to the Complainant and Respondent within 90 days from receipt of the complaint.
- 9) A complainant may file a complaint directly with the Federal Transit Administration *at any time* by filing a complaint with:

Office of Civil Rights Attention: Title VI Program Coordinator East Building, 5th Floor-TCR 1200 New Jersey Ave., SE Washington, DC 20590.

Please note that the words "at any time" in the above sentence mean that Title VI complaints filed with the Federal Transit Administration by the Complainant may be filed at any point the complainant deems necessary and is <u>not</u> contingent upon the status of their complaint filed with METRA Transit System. Complainants <u>do not</u> have to wait_for a response or finding from METRA before submitting their complaint to the FTA. Complainants may file a complaint directly with FTA as an alternative to filing with METRA.

10) The Complainant has a right to request an appeal of any complaint resolution made by METRA. Such appeals are to be directed in writing to METRA's Title VI Coordinator who, upon receipt, will notify METRA of the appeal and then forward the appeal to the Human Resources Department of the Consolidated Government of Columbus, Georgia. Human Resources will review and make a decision on whether to uphold or overturn METRA's complaint resolution.

FTA Complaint procedures can also be found on the FTA web site at: www.fta.dot.gov. These procedures are also outlined in FTA Circular 4702.1A, Chapter IX.



Title VI Complaint Form

A formal complaint must be filed within 180 days of the alleged discrimination occurrence.

Instructions: If you would like to submit a Title VI complaint to METRA Transit System, please fill out the form below and send it to: METRA: Attn: Title VI; PO Box 1340; Columbus, Georgia 31901. For questions or a full copy of METRA's Title VI policy and complaint procedures contact METRA's Civil Rights Officer at: 706-225-4603, or email at Sheridan.Robert@columbusga.org.

A complainant may file a complaint directly with the Federal Transit Administration *at any time* by filing a complaint to:

Office of Civil Rights Attention: Title VI Program Coordinator East Building, 5th Floor-TCR 1200 New Jersey Ave., SE Washington, DC 20590.

The Complainant has a right to request an appeal of any complaint resolution made by METRA. Such appeals are to be directed in writing to METRA's Title VI Coordinator.

1. Name (Complainant):			
2. Phone:	3. Home address (street no., city, state, zip):		
4. If applicable, name of person(s) who allegedly discriminated against you:			
5. Location and position of person(s)	if known:	6. Date of incident:	
7. Describe discrimination cause:			

8. Explain as briefly and clearly as possible what happened and how you believe you were discriminated against. Indicate who was involved. Be sure to include how you feel other persons were treated differently than you. Also, attach any written material pertaining to your case.
9. Why do you believe these events occurred?
10. What other information do you think is relevant to the investigation?
11. How can this/these issue(s) be resolved to your satisfaction?
12. Please list below any person(s) we may contact for additional information to support or clarify your complaint (witnesses):

Name:	Address:	Ph	one number:	
13. Have you filed this complain	t with any agency	v: or with any feder	ral or state court?	
□ Yes □ No		, ,		
If yes, check all that apply:				
\Box Federal agency \Box	Federal court	☐ State cour	t	
☐ Local agency ☐	State agency			
If filed at an agency and/or court, please provide information about a contact person at the agency/court where the complaint was filed.				
		Address:	Phone number:	
Ç ,				
Signature (Complainant):			Date of filing:	

APPENDIX D

METRA Transit System Record of Title VI Complaint Activities

APPENDIX D

METRA Transit System Record of Title VI Complaint Activities (*Sample, no complaints were received or filed)

1. Date Complaint was Filed	2. Summary of Allegation	3. Status of investigation	4. Resolution, outcome, or actions taken	Additional Information
Sample *Jan 12, 2009	Sample *Bus stop signs on Box St. all in yards of Black homeowners	Sample *Investigation completed Jan 15, 2009	*Bus Stops located &mapped. Met with residents to show on map of signs, placement based optimum travel access.	Sample *Complainant wanted bus stop sign removed from yard. Complaint unfounded. Sign removed Jan 25, 2009

APPENDIX E

METRA Transit System Limited English Proficiency Plan (LEP)

APPENDIX E

METRA Transit System Limited English Proficiency Plan (LEP)

Purpose

METRA Transit System's Limited English Proficiency Plan (LEP) has been prepared to address METRA's responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq, and its implementing regulations, which state that no person shall be subjected to discrimination on the basis of race, color or national origin.

Executive Order 13166, titled Improving Access to Services for Persons with Limited English Proficiency, indicates that differing treatment based upon a person's inability to speak, read, write or understand English is a type of national origin discrimination. It directs each federal agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all state and local agencies, which receive federal funds, including the Columbus Transportation Department, METRA, which receives federal assistance through the U.S. Department of Transportation (U.S. DOT).

Limited English Proficiency (LEP) Plan Summary

METRA has developed its Limited English Proficiency Plan (LEP) to help identify reasonable steps for providing language assistance to persons with limited English proficiency that may wish to access services provided by the transit authority. As defined in Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write or understand English.

This plan outlines how to identify a person who may need language assistance. The ways language assistance may be provided. Staff training that may be required on how to notify LEP persons that language assistance is available.

In order to prepare this plan, METRA used the U.S. DOT four-factor LEP analysis, which considers the following factors:

- 1. The number or proportion of LEP persons in the service area who may be served or are likely to encounter a METRA program, activity or service.
- 2. The frequency with which LEP persons come in contact with METRA programs, activities or services.



- 3. The nature and importance of programs, activities or services provided by METRA to the LEP population.
- 4. The resources available to METRA and the overall costs to provide LEP assistance.

Summary of the results of METRA's four-factor analysis is in the following section.

Four-Factor Analysis

1. The number or proportion of LEP persons in the service area who may be served or are likely to encounter a METRA program, activity or service.

METRA staff reviewed the 2010 U.S. Census Bureau data for Interactive Populations and determined that 12,689 persons in Muscogee County (7% of the population speak a language other than English). In Muscogee County, 3,395 (1%) have limited English proficiency; that is, they speak English "less than very well." --

According to a 2015 estimate from the U.S. Census Bureau's 5-year American Community Survey estimate, 9.62% of people in Muscogee County, Georgia speak a non-English language. 10,119 people (5.46%) spoke Spanish or Spanish Creole, 1,441 people (0.778%) spoke German, and 1,249 people (0.674%) spoke Korean. Spanish or Spanish Creole is the most common non-English language spoken, German is the second most common non-English language spoken, and Korean is the third most common non-English language spoken. According to 2013-2017 American Community Survey 5-Year Estimates, of the 73,179 households in Muscogee, Georgia, 1,389 (1.9%) had limited English proficiency.

According to a 2013-2017 U.S. Census Bureau American Community Survey estimate on Languages Spoken at Home in Muscogee County, Georgia, 3.3% of persons 5 years and older have limited English proficiency.

Language Spoken at Home	Estimate	Margin of Error	Percentage
Population 5 years and over	183,854	+/-69	100%
English Only	166,744	+/-952	90.7%
Language other than English	17,110	+/-949	9.3%
Speak English less than "very	6,062	+/-578	3.3%
well"			

Additionally, the population that speaks English less than "very well" is broken down as follows:

Language Spoken	Pop. Speaking English less than "very well"	Population Percentage (Rounded)
Spanish	3,554	1.93%
Other Indo-European	1,147	0.62%
Asian and Pacific Island	1,126	0.61%
Other	235	0.13%
Total	6,062	3.29% rounded to 3.3%

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2. The frequency with which LEP persons come in contact with METRA programs, activities or services.

METRA has assessed the frequency with which staff and drivers have come into contact with LEP persons. This assessment involves documenting phone inquiries and surveying vehicle operators. To date, METRA has had a limited number of requests for interpreters and no requests for translated METRA documents in the City of Columbus/Muscogee County service area (documents, such as route brochures, are available in Spanish and French). METRA has received 3 non-English phone inquiries (all were Spanish/Spanish Creole inquiries) since the last Title VI update in 2016. Staff and vehicle operators have reported no contact or very infrequent contact with LEP persons. All LEP translation requests are documented by METRA. In 2019, for example, METRA received 1 LEP request. The call date is logged, the name of the caller is documented, the METRA division to which the call pertains is listed, and a brief description of the call's content is documented.

2019 LEP Call Log

	DATE	NAME	DEPARTMENT	IN REFERENCE
1	5/7/19	[Name removed]	Parking Division	Citation ticket
2				
3				

3. The nature and importance of programs, activities or services provided by METRA to the LEP population.

According to a 2013-2017 estimate from the US Census Bureau's QuickFacts, 9.3% of persons age 5 and over speak a language other than English at home.

The City and METRA are actively involved with Hispanic Outreach efforts. From the grass roots level, to involvement in organizations that reach out to international citizens for the express purpose of providing public service information, making each LEP person feel included and reassured that they are welcome in our community is the City and METRA's goal. METRA conducts outreach to LEP individuals via public access television, attending community forums, and working with local organizations (both public and private). These groups and activities reach out to citizens with language challenges. Services provided by METRA which are most likely to encounter LEP individuals include: fixed route buses (which serve the general public) and the complementary demand response Dial-a-Ride ADA program (which serves certified disabled persons within the service area unable to access the fixed bus system).

4. The resources available to METRA and the overall cost of providing LEP assistance.

METRA has assessed the available resources that could be used for providing LEP assistance, including determining how much a professional interpreter and translation service would cost on an as-need basis. METRA has also determined the vital documents that a rider would need that would have to be translated for a LEP person. METRA has taken inventory of available organizations that it could partner with for outreach and translation efforts. The amount of staff and vehicle operator training that might be needed is also considered. METRA is working with Columbus State University's language department to secure student interns who will review our currently translated literature and documents and update and standardize them, if needed.

Based on the four-factor analysis, METRA developed its LEP Plan as outlined in the following section.

<u>Limited English Proficiency (LEP) Plan Outline</u>

How METRA staff identify a LEP person who may need language assistance.

- A. Examine records and information to see if requests for language assistance have been received in the past; either at public meetings, over the phone, customer comment cards, on-line at our website, through the City 311 call center, bus operator information, and information provided by the Mayor's Committee for International Relations (which METRA participates on). All possible resources are used to determine whether language assistance might be needed currently or in the future.
- B. When METRA sponsors an event, we have a staff person greet participants as they arrive. By informally engaging participants in conversation, it is possible to gauge each attendee's ability to speak and understand English.
- C. Having Census Bureau Language Identification Flashcard books available at METRA events near the registration table. Individuals self-identifying as persons not proficient in English may not be able to be accommodated with translation assistance at the event, but it will assist the sponsoring agency in identifying language assistance needs for future events.
- D. Having Language Identification Flashcard books on all transit vehicles to assist vehicle operators in identifying the specific language assistance needs of passengers. If such individuals are encountered, vehicle operators will be instructed to try and obtain contact information to give to the transit system manager for a follow-up. Dispatchers and schedulers will also be instructed to obtain contact information from LEP individuals they encounter, either in person or over the phone.
- E. Language Identification Flashcard books will be made available at the Transfer Center and at the main office reception desk.
- F. Vehicle operators and other front-line staff, like dispatchers, dial-a-ride schedulers, and service development planners, will be surveyed annually on their experiences concerning any contacts



with LEP persons during the previous year. This survey will be conducted in October of each year.

Language Assistance Measures

METRA will ensure that the following measures are in place:

- -Language Identification Flashcards books are available at all times in METRA and may be found at the Transfer Center and the Administration Building.
- -The METRA Title VI Policy and Limited English Proficiency Plan will be posted on the agency website, <u>www.columbusga.org/METRA-</u>
- -METRA has updated our website to include GOOGLE Translate's online translation service for the site accessible by staff.
- -When an interpreter is needed, in person or on the telephone, staff will attempt to determine what language is required and then access language assistance services at <u>www.languageline.com</u>.
- -All METRA website pages have a link that allows the reader to select one of 66 languages. The page will automatically translate once a language is selected.
- -Public information notices are printed in Spanish and French for public access.
- -METRA participates in the City's public access Hispanic Talk Show, updating the community on: special events, local destinations, how much our fares are, special discounts (i.e., seniors, students, disabled), and how individuals may qualify for the special bus fares.

Staff Training

The following training will be provided to METRA and AOI staff:

- -Information on the METRA Title VI Policy and LEP responsibilities.
- -Description of language assistance services offered to the public.
- -Use of the Language Identification Flashcard books.
- -Documentation of language assistance requests.
- -Use of language line service.
- -How to handle a potential Title VI/LEP complaint.

Outreach Techniques

Due to the relatively small local LEP population, METRA does not have a formal outreach procedure in place but is very active in LEP activities, both public and private. METRA has in the past taken, and will continue to take, an active role in the Mayor's Committee on Unity and Diversity and the Hispanic Outreach Committee. METRA has attended in the past, and will continue to attend, community outreach programs (i.e., attending the First Hispanic International Festival in 2013). These programs are designed to provide information and cultural awareness. They also help diminish barriers to public services, including public transit services. When the

opportunity arises for LEP outreach, METRA considers the following:

- -When staff prepares a document, or schedules a meeting, for which the target audience is expected to include LEP individuals, documents, meeting notices, flyers, and agendas will be printed in an alternative language based on the known LEP population(s).
- -Bus schedules, maps, and other transit publications are made available in an alternative language when, and if, a specific and concentrated LEP population is identified.
- -Bringing bilingual staff to events and activities to serve as interpreters. METRA employs a diverse staff and some of those staff have bilingual skills (i.e., Spanish, French, Jamaican dialect, and others).

Outreach Meetings and Events that METRA Participates in.

Meeting Frequency	Event Type	Location
Monthly	Hispanic Outreach Committee	*Mildred L. Terry Library
Monthly	Mayor's Innovation Committee	*Mildred L. Terry Library
Monthly	Mayor's Committee for Persons with Disabilities	*Cross Country Office Plaza
Monthly	Mayor's Commission on Unity, Diversity, and Prosperity	CCG Annex Building
Bi-Monthly	Citizen Advisory Committee	Citizens Service Center
Quarterly	Technical Coordinating Committee	CCG Annex Building
Monthly	Policy Coordination Committee	Government Center
Monthly	Columbus Chapter of the NAACP General Meeting	Corporate Center

^{*}Locations for these events may be subject to change based on the availability of space, hosts, and locations.

Expected Outcome and Purpose of Meetings

As it relates to Title VI, METRA Transit System participates in the listed meetings and events for the purpose of soliciting and receiving public input on public transportation plans and services from Title VI and LEP communities. METRA, through the public involvement in these events and meetings, seeks to allow all interested individuals in Title VI and LEP communities the opportunity to comment on and to be actively engaged in the provision of transit.

During meetings of the Columbus Chapter of the NAACP, METRA staff actively solicit ideas and concerns from prominent leaders of the African American community in Columbus, Georgia. Several members have expressed their concerns with a lack of bus shelters at certain locations.

During Hispanic Outreach Committee meetings, METRA staff interact with and receive input from Columbus, Georgia's Hispanic population and representatives of the Spanish LEP population.

Citizen Advisory Committee, Technical Coordinating Committee and Policy Coordination Committee meetings are MPO meetings attended to by METRA staff. Meetings are open to the public, including to Title VI and LEP populations. Issues, concerns and plans for the community are discussed. Civil Rights issues relating to planned projects are also discussed and debated.

The Mayor's Commission on Unity, Diversity, and Prosperity addresses issues and projects related to tackling the issues of poverty and economic segregation.

The Mayor's Innovation Committee and the Mayor's Committee for Persons with Disabilities are open to the public and address the concerns of minority and LEP populations when issues or concerns relating to discrimination on the basis of race, color and national origin are expressed.

[See Appendix J for copy of METRA's overall Public Participation Process].

Monitoring and Updating the LEP Plan

METRA will update its LEP Plan as required by U.S. DOT. At a minimum, the plan will be reviewed and updated with 2010 U.S. Census data, or when it is clear that a higher concentration of LEP individuals are present in the METRA service area. Updates will include the following:

- -The number of documented LEP persons contacted or encountered annually.
- -How the needs of LEP persons have been addressed.
- -A Determination of the current LEP population in the service area.
- -A Determination as to whether the need for translation services has changed.
- -A Determination of whether local language assistance programs have been effective and sufficient to meet the need.
- -A Determination as to whether the transit system's financial resources are sufficient to fund the language assistance resources needed.
- -A Determination as to whether METRA and AOI have fully complied with the goals of this LEP Plan.
- -A Determination as to whether complaints have been received concerning the agency's failure to meet the needs of LEP individuals.
- -A Dissemination of METRA's LEP Plan

A link to METRA's LEP Plan and the Title VI Plan will be included on METRA's website, www.columbusga.org/METRA.

Any person or agency with Internet access will be able to access and download the plan from the METRA website. Alternatively, any person or agency may request a copy of the plan via telephone, fax, mail, or in person, and shall be provided a copy of the plan at no cost. LEP individuals may request copies of a translated plan, which METRA will provide, if feasible.

Questions or comments regarding the LEP Plan may be submitted to METRA, the MPO, the EEO/AA Office, and the City Manager's Office at each website or by contacting the City's 311 information center. <u>@Columbus Consolidated Government.org</u>







I speak... IDENTIFICATION

This language identification guide is a tool for law

enforcement and other criminal justice agencies to identify the language of individuals they encounter who do not speak English.

Summit County Sheriff's Office The National Association of Judiciary Interpreters and Translators American Translators Association

2nd Edition - 7/1

Office of Criminal Justice Services
OHIO
DEPARTMENT
OF PUBLIC
SAFETY

LANGUAGE

GUIDE

State of Ohio Office of Criminal Justice Services





The Purpose of This Language Identification Guide

As the limited English proficient (LEP) population continues to increase in the state of Ohio and nationwide, the number of LEP defendants, victims, and witnesses processed through the Ohio criminal justice system will also increase. This guide can help to obtain interpretive services, which is the first step in working with LEP persons. It is also intended as a resource for the criminal justice community to ensure consistent and effective interaction with LEP persons.

Page 47 of 86





I speak ...

 \boldsymbol{A}

Arabic أنا أتحدث اللغة العربية

Armenian Ես խոսում եմ հայերեն

R

Bengali

আমী ঝংলা কখা ঝেলতে পারী

Page 48 of 86



Bosnian

Ja govorim bosanski

Bulgarian Аз говоря български

Burmese

ကျွန်တော်/ကျွန်မ မြန်မာ လို ပြောတတ် ပါတယ်၊

Page 49 of 86



Page 50 of 86



C

Cambodian



Cantonese

我講廣東話

(Traditional)

我讲广东话

(Simplified)

Catalan

Parlo català

Croatian

Govorim hrvatski

Czech

Mluvím česky



D

Dari

من دری حرف می زنم

Dutch

Ik spreek het Nederlands

F

Farsi

من فارسى صحبت مى كنم

French

Je parle français

6

German

Ich spreche Deutsch



G

Greek

Μιλώ τα ελληνικά

Gujarati

હુ ગુજરાતી બોલુ છુ

H

Haitian Creole

M pale kreyòl ayisyen

Hebrew

אני מדברת עברית

Hindi

में हिंदी बोलता हूँ।



Hmong

Kuv has lug Moob

Hungarian

Beszélek magyarul

Ilocano

Agsaonak ti Ilokano

Italian

Parlo italiano

Japanese

私は日本語を話す



K

Kackchiquel

Quin chagüic ká chábal ruin rí tzújon cakchiquel

Korean

한국어 합니다

Kurdish

man Kurdii zaanim

Kurmanci

man Kurmaanjii zaanim

I

Laotian

ຂອຍປາກພາສາລາວ



Latvian

Es runâju latviski

Lithuanian

Að kalbu lietuviškai

M

Mandarin

我講國語

(Traditional)

我讲国语/普通话

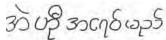
(Simplified)



Mam

Bán chiyola tuj kíyol mam

Mon



N

Norwegian

Jeg snakker norsk

P

Persian

من فارسى صحبت مى كنم.

Polish

Mówię po polsku



Portuguese

Eu falo português do Brasil (for Brazil)

Eu falo português de Portugal (for Portugal)

Punjabi

ਮੈਂ ਪੰਜਾਬੀ ਬੋਲਦਾ/ਬੋਲਦੀ ਹਾਂ।



Q

Qanjobal

Ayin tí chí wal q'anjob'al

Quiche

In kinch'aw k'uin ch'e quiche

R

Romanian

Vorbesc româneşte

Russian

Я говорю по-русски



S

Serbia Ја говорим српски



Sign Language (American)





SIGN, SIGN LANGUAGE

Slovak

Hovorím po slovensky

Somali

Waxaan ku hadlaa af-Soomaali

Spanish

Yo hablo español

Swahili

Ninaongea Kiswahili

Swedish

Jag talar svenska



T

Tagalog

Marunong akong mag-Tagalog

^{Thai} พูดภาษาไทย

Turkish

Türkçe konuşurum

U

Ukrainian

Я розмовляю українською мовою

Urdu میں اردو بولتا ہوں



V

Vietnamese

Tôi nói tiêng Việt

W

Welsh

Dwi'n siarad

\boldsymbol{X}

Xhosa

Ndithetha isiXhosa

Υ

Yiddish איד רעד יידיש



Yoruba

Mo nso Yooba

Z

Zulu

Ngiyasikhuluma isiZulu

Ohio Office of Criminal Justice Services

1970 W. Broad St. Columbus, OH $\,43223$

Phone: (614) 466-7782 Toll-Free: (888) 448-4842 www.ocjs.ohio.gov

CJS 0007 7/15 [760-1109]



APPENDIX F

METRA Transit System Minority Representation on Planning and Advisory Bodies

APPENDIX F

METRA Transit System Minority Representation on Planning and Advisory Bodies

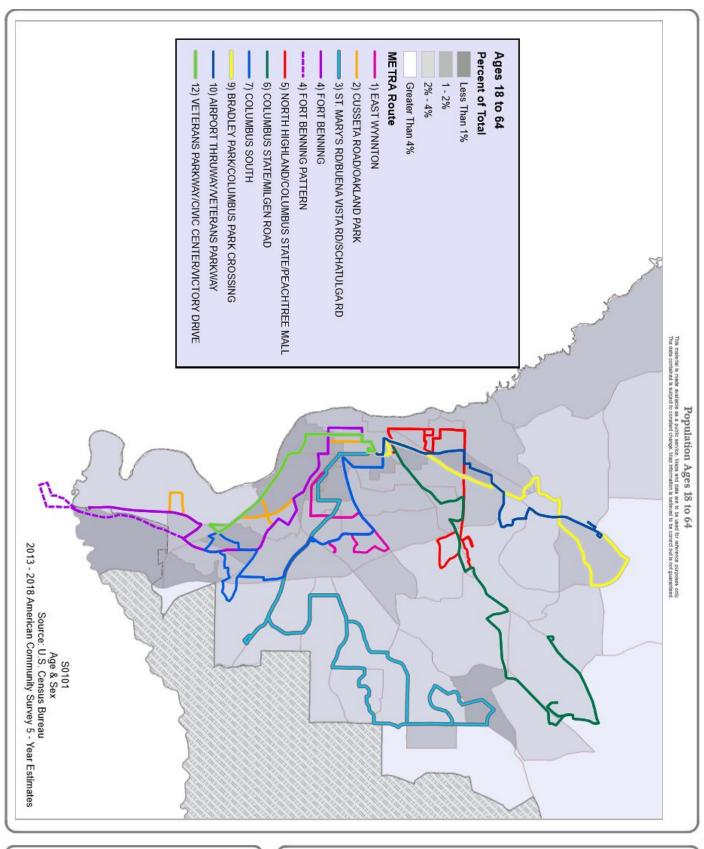
MPO Committee	Number of Members	Minority Percentage	
Policy Coordinating Committee	12 members	17% minority	
Technical Coordinating Committee	17 members	24% minority	
Citizen Advisory Committee	9 members	56% minority	

Members of the Policy Coordinating Committee and the Technical Coordinating Committee are selected by title. Members of the Citizen Advisory Committee are selected by the Citizen Advisory Committee or the Policy Coordinating Committee and citizens of the region who belong to organizations that reflect the viewpoints of the region's citizens overall.

METRA has no control over who is appointed to or selected for service in any of the three MPO Committees.

APPENDIX G

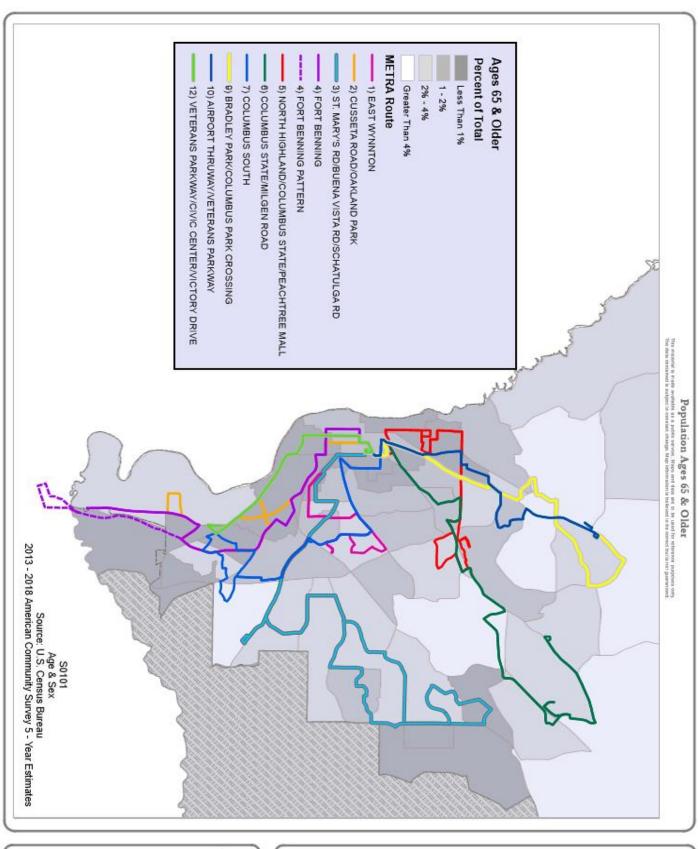
METRA
Transit System
Maps

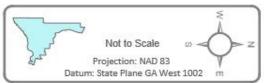






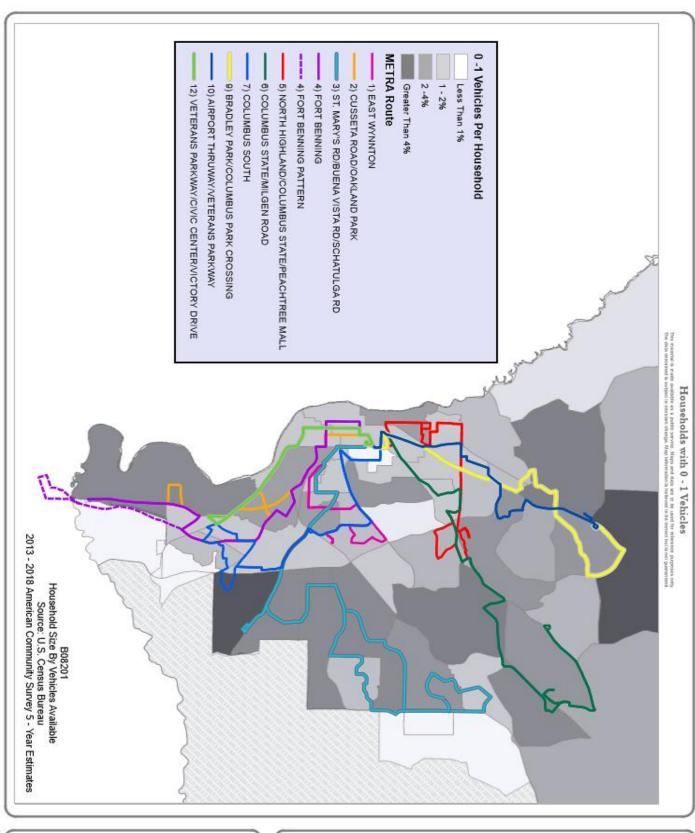








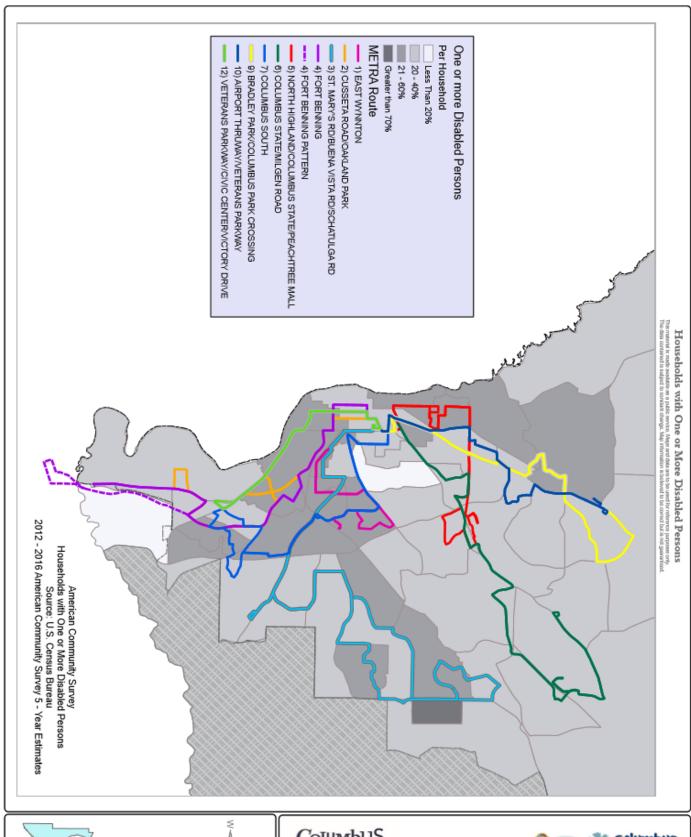








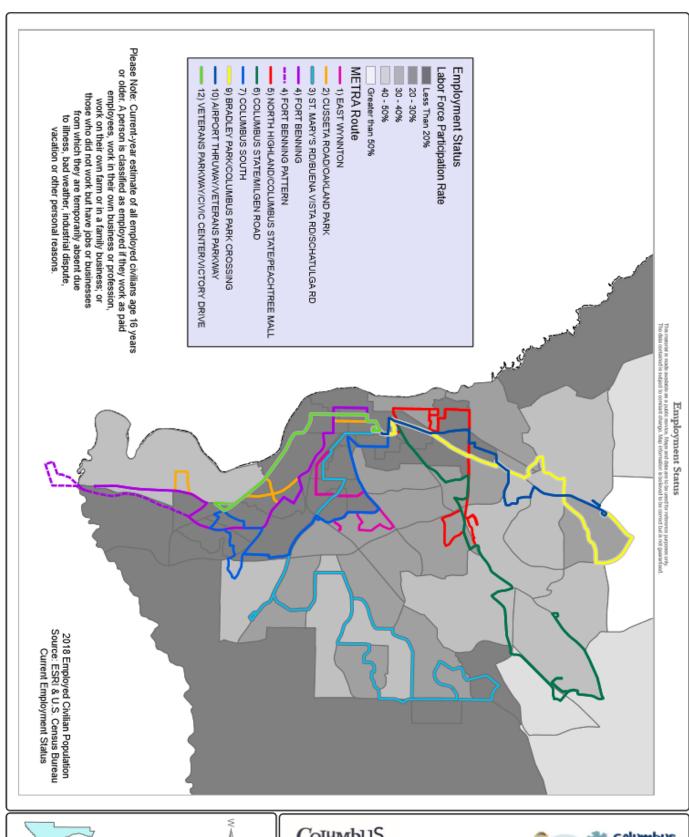










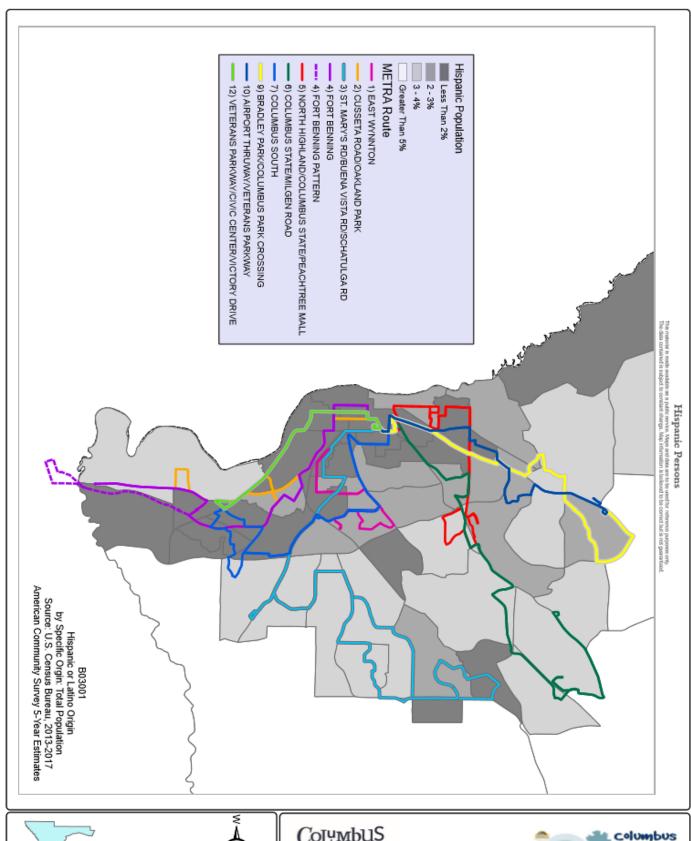










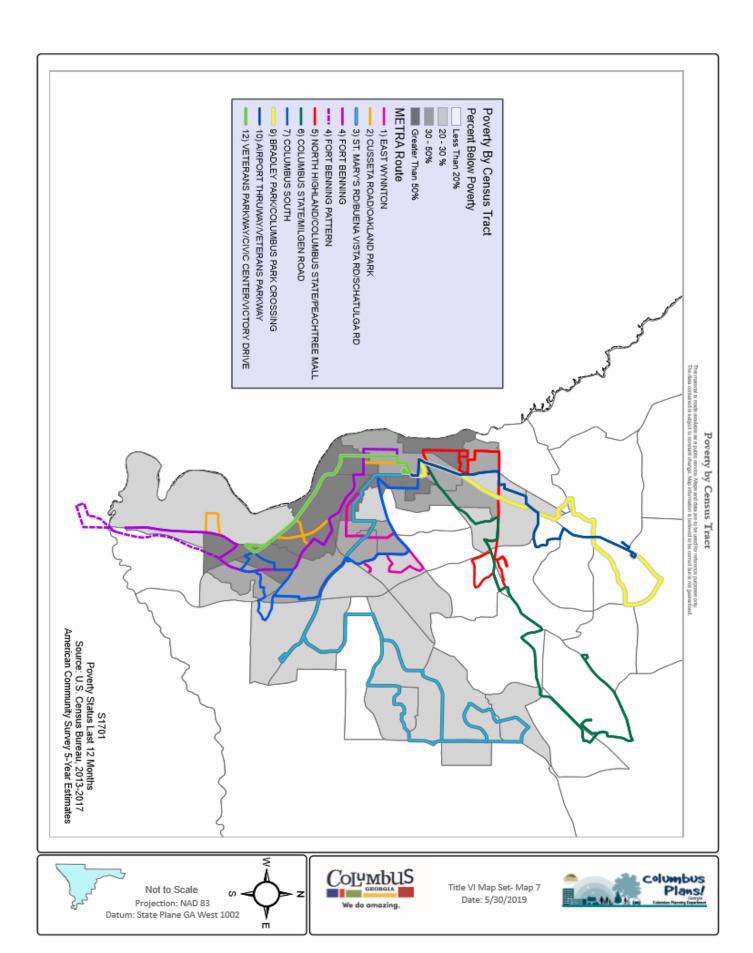


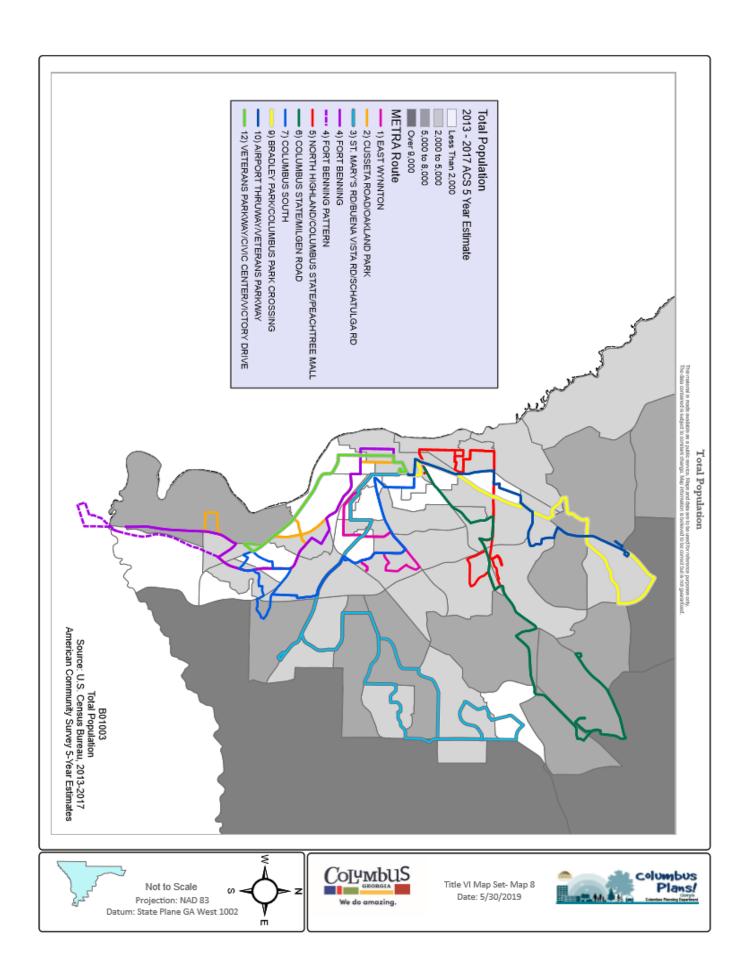


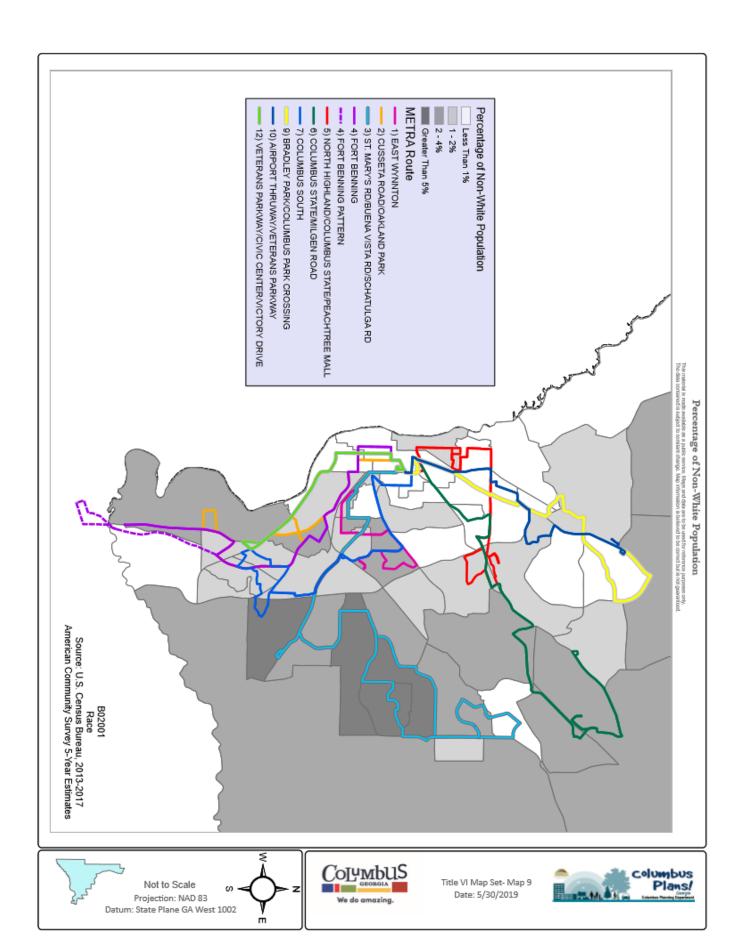


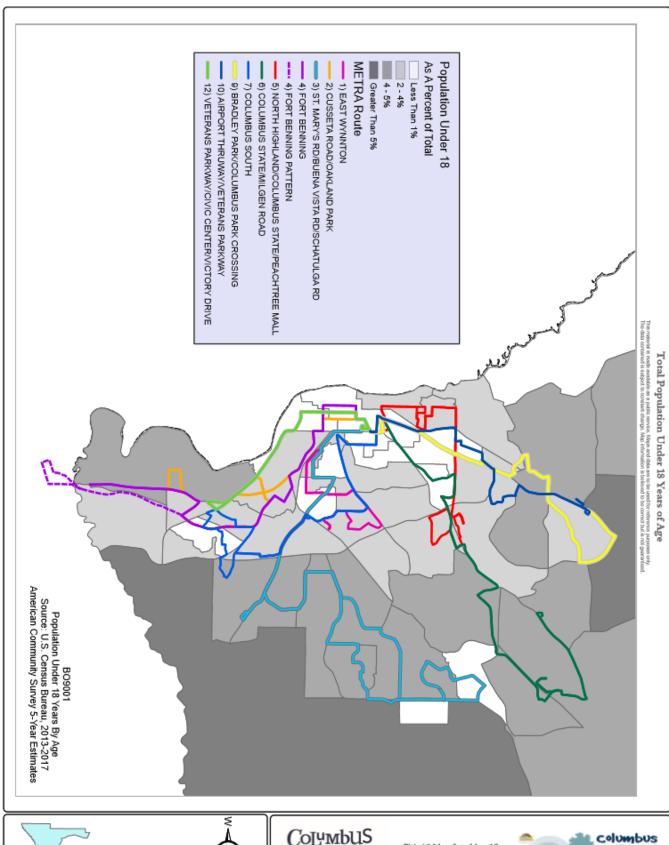


















APPENDIX H

METRA Transit System September MPO Policy Committee Approval of Title VI Program 2019

RESOLUTION

MPO POLICY COMMITTEE

WHEREAS, the Columbus Metropolitan Transit System (METRA) has been designated as the public transportation entity for the City of Columbus, Georgia and Muscogee County, Georgia by the Consolidated Government of Columbus, Georgia (the City).

WHEREAS, METRA, on behalf of the City, operates federally required transportation services in Muscogee County, Georgia and in the Columbus, Georgia metropolitan area.

WHEREAS, METRA is a recipient of federal funding and, as required in accordance with Title VI of the Civil Rights Act of 1964 and other nondiscrimination statutes, executive orders and regulations, must develop a Title VI Program; and

WHEREAS, on April 17, 2012 the Governor of Georgia signed HB 397 into law that amends the Georgia Open Meetings and Open Records Laws; and

WHEREAS, for all federal funding recipients (including sub-recipients), the Title VI Program must be approved by the recipient's policy decision officials.

NOW, THEREFORE BE IT RESOLVED, that the Columbus-Phenix City Transportation Study (C-PCTS) Policy Committee adopts METRA's Title VI Program/ Nondiscrimination Program as required by Title 23 (USC 134 Section 450.308) and pursuant to the Safe, Accountable, Flexible, Efficient Transportation Equity Act – A Legacy for Users (SAFETE-LU), Moving Ahead for Progress in the 21st Century (MAP-21), the Fixing America's Surface Transportation Act (FAST Act), Title VI of the Civil Rights Act of 1964, and Executive Order 13166; Title 50 OCGA; and other nondiscrimination statutes, executive orders and regulations.

Mayor B.H. "Skip" Henderson, III, Chairman

Policy Committee

Date

Attest:

Rick Jones, MPO/Planning Director

[MPO Policy Committee Resolution Accepting METRA's 2019 Title VI Program Update. This letter was signed by the Committee Chair after the Committee voted to approve the document.]

POLICY COORDINATING COMMITTEE (PCC) AGENDA

September 17, 2019

Columbus Government Center – 100 10th Street Ground Floor Conference Room 11:00 A.M.

- 1. Call to Order Mayor Skip Henderson
- 2. Roll Call Millicent Burden
- 3. Approval of Minutes for PCC Mayor Skip Henderson
- 4. Discussion Items:
 - 2045 Metropolitan Transportation Plan Update Rick Jones
 - METRA 2020 Title VI Plan Rosa Evans and Robert Sheridan
 - Other Discussion Items
 - ♦ Second Avenue and J.R. Allen Parkway Traffic Studies PL Funds
- 5. Updates on Projects ALDOT & GDOT
- 6. Adjournment

[MPO Policy Committee Agenda for September 17, 2019 showing METRA's 2019 (FY 2020) Title VI Program Update on the agenda for the meeting.]

POLICY COORDINATING COMMITTEE

September 17th, 2019

11:00 AM

COLUMBUS GOVERNMENT CENTER GROUND FLOOR CONFERENCE ROOM

MEETING MINUTES

Members Present: Mayor Skip Henderson, Rick Jones, Chris Casey (Mayor Eddie Lowe), Radney Simpson (Russell McMurray), Rebekah Crawford (Steve Graben), Rosa Evans, Lisa Sandt

Members Absent: Jonell Minefee, Peggy Martin, Bill English, Lynn Westmoreland, Johnny Floyd, Joseph Addison,

Advisory Members: Lynda Temples, Felton Grant, Addie Britt, Jacqueline Williams, Robert Sheridan, Scott Moseley, Khalil Williams, Tracy Hattaway, Harland Smith, Pam Hodge

Recording Secretary: Millicent Burden

- · The meeting was called to order at 11:00 am by Rick Jones
- Millicent Burden called the roll
- Minutes from the August 20th meeting was approved unanimously
- Lynda discussed the 2045 Metropolitan Transportation Plan Update
 - Will be scheduled for council
- · Rick went thru other discussion items:
 - o 2nd Ave & J.R. Allen Parkway Traffic Studies PL Funds
- Rebekah Crawford gave ALDOT Update
- Harland Smith gave GDOT update
- Rick Jones gave Columbus update
- Chris Casey gave Phenix City update
- Lisa Sandt gave Lee/Russell updates
- Rosa Evans introduced Robert Sheridan, METRA Transit Compliance Officer
 - Robert Sheridan presented METRA's 2020 Title VI Plan / approved unanimously
- No further discussion, meeting adjourned at 11:27 am

[MPO Policy Committee Meeting Minutes for September 17, 2019 showing METRA's 2019 (FY 2020) Title VI Program Update as being presented and approved by the committee.]

APPENDIX I

METRA Transit System Title VI Notice in Local Newspapers

Security Deed Brst

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P. O. Box 1126 Columbus, Georgia 31902 Publish: July 10,17,24,31(0004292322) agent at such address is Angel Mercado, Pub:July10&17,2019(0004294195)

Notifying the Public of Rights Under Title VI The Columbus Consolidated Government – Department of Transportation/METRA Transit System

The City of Columbus/METRA Transit System ("METRA") operates its program
and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved
by any unlawful discriminatory practice under Title VI may file a complaint with the
City of Columbus/METRA.

 For more information on the City of Columbus/METRA's civil rights program, and the procedures to file a complaint, contact (706) 225-4581, or mail completed forms to: METRA: Attn: Title VI; PO Box 1340; Columbus, GA 31901. For more information, visit www.metratransit.com.

 A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Federal Transit Administration Region IV, Attention Civil Rights Officer, 61 Forsyth Street, SW Suite 17T50 Atlanta Georgia 30303, (404) 855-5600.

If information is needed in another language, contact (706) 225-4581 o SI se necesita informacion en otro idoma, llame (706) 225-4581

Si l'information est necessaire dans une autre langue, contactez (706) 225-4581
 Publish: July 17 (0004285973)

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[Published in the Columbus, Georgia Ledger-Enquirer on July 17, 2019]

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Columbus Water Works

COLUMBUS WATER WORKS invites applications for the position of:

Manager of Information Services (External)

SALARY: PAY GRADE: 16

\$36.23 - \$54.35 Hourly \$2,898.40 - \$4,348.00 Biweekly \$6,279.87 - \$9,420.67 Monthly \$75,358.40 - \$113,048.00 Annually

OPENING DATE: 07/1

CLOSING DATE: 09/11/19 05:00 PM

DESCRIPTION:

The IS Manager's role is to ensure the streamlined operation of the IS Department in alignment with the business objectives of the organization. This individual will plan, coordinate, direct, and design iS-related activities of CWW, as well as provide administrative direction and support for daily operational activities of the IS department. The IS Manager will work closely with decision makers in other departments to identify, recommend, develop, implement, and support cost-effective technology solutions for all aspects of the organization. This person will also define and implement IS policies, procedures, and best practices. Works under the direct guidance of the Senior Vice President of Information, Security & Environmental Services.

SUPERVISORY RESPONSIBILITIES:

Supervises and directs work of the Information Services staff.

EDUCATION AND EXPERIENCE:

Bachelor's degree from an accredited college or university in Computer Science or other IT related field. A minimum of five years progressively responsible work experience in Information Systems with a thorough understanding of IS Project Management is required and a minimum of 3 years of supervisory experience required, or any equivalent of experience, education, and training which provides the required knowledge, skills and abilities. Technically competent in M5 Office 2013 or Office 365 is required. Project management skills in applying appropriate resources to complete IT projects within scope, budget and schedule required; Knowledge and experience in specific IT tasks and ability to manage personnel to successfully accompish tasks in an efficient manner required; Experience in strategic planning and execution preferred. Experience to programming and database management preferred. Strong familiarity with project management software such as M5 Projects preferred. Onabase and operating systems experience with M5 SQL Server and Windows sorre glatforms preferred. Competent and proficient understanding of platforms and solid working knowledge of current internet technologies preferred. Demonstrated experience in personnel management preferred. Experience interviewing end-users for insight on functionality, interface, problems, and/or usability issues preferred. a combination of experience, training and education that provides the acceptable knowledge, skills and abilities may satisfy any of these requirements. Fiexible and adaptable in learning and understanding new technologies; Ability to conduct research into software-related issues and products. Ability to work both independently and in a team-oriented, collaborative environment; Ability to effectively prioritize and execute tasks. Can conform to salidid driver's license and good driving record.

Notifying the Public of Rights Under Title VI The Columbus Consolidated Government - Department of Transportation/METRA Transit System

- The City of Columbus/METRA Transit System ("METRA") operates its program and services without regard to race, color, and national origin in accordance with Title Vt of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title Vt may file a complaint with the City of Columbus/METRA.
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 with the Federal Transit Administration Region IV, Attention Civil Rights Officer, 61 Forsyth Street, SW
 Suite 17T50 Atlanta Georgia 30303, (404) 865-5600.
- If information is needed in another language, contact (708) 225-4581
 - Si se necesita información en otro idoma, flame (706) 225-4581
 - Si l'information est necessaire dans une autre langue, contactez (706) 225-4581

APPENDIX JPublic Participation Plan

METRA Transit System Public Participation Process Columbus, Georgia

Purpose

This document is prepared as required by Federal regulations provided in FTA Circular 9030.1A. The City's transit system, METRA, follows a defined policy for soliciting public participation and input when it comes to: fare and major service changes and the development and of the proposed and final annual Program of Projects (POP).

Definition

The major service reduction are defined as the reductions which decrease either service hours or service miles for a specific route by at least twenty percent (20%), or which change the service area of the transit system.

All fare changes are subject to the public participation and involvement process.

The Program of Projects is (POP) is the annual coordinated outline of proposed and final public transit service transportation plans and projects developed in consort with the Metropolitan Planning Organization (Columbus-Phenix City Metropolitan Planning Organization ((CPCMPO)) 3-C planning process and with input the public at large.

Fare or Service Change Process

- 1.) A notice is to be placed in the general circulation newspaper and minority newspaper. The notice will briefly describe the proposed fare increase or major service reduction. The notice will advise of the upcoming date for a public meeting for the purpose of soliciting public comments. The notice will include the address where public comments can be sent to and a reasonable time period for receiving public comments. Also, information about the public meeting will be provided.
- 2. A public hearing is held as announced in the published notice.

- 3.) All comments received will be considered in the final decision- making process. While the final plan may not necessarily be changed based on the public participation process, significant consideration is given to the comments made by the public and the proposed changes may very well be affected.
- 4.) All the information, including the proposed changes, public announcements, comments received, public hearing transcripts/minutes, etc., will be documented for reference and review as needed.

Policy Statement

The Department of Transportation/METRA Transit System sets forth the following public involvement policy for the purpose of soliciting and receiving public input on public transportation plans and services. The Department of Transportation/METRA through the public involvement process seeks to allow all interested individuals the opportunity to comment on and to be actively engaged in provision of transit.

Intent

- •The public involvement guideline will be used for all "major" changes in fares and services.
- •Fare changes that affect all categories of ridership (i.e., student, regular, senior, and disabled) will be considered major.
- •Service levels increases or decreases of 20% over existing miles or hours will be considered major.
- •Changes in service area of the transit system are major.

Policy Guidelines

1.) The public hearing notice for service and fare changes will be advertised 45 days before the scheduled change is to be implemented. Advertisements will appear at a minimum in the local citywide newspaper and minority newspaper, government access channel, on all route buses, and as a public service announcement on local radio and television. Documents outlining the proposed changes will be available for review at METRA, at the Government Center, at the Transfer Center, and on the buses. Customers also provide comments by placing cards into a locked comment box at the Transfer Center. Customers can phone in comments to the City's 311 Center. Disabled customer can access METRA through the TDD phone system or the Georgia Relay System. The annual POP is advertised in the local citywide newspaper and minority newspaper for public comment 45 days prior to final notice. If there are no comments, the first advertisement will state on the ad that this is the final comment. Each comment is recorded and response is provided (comments that have a name and address or phone number. The office is not able to respond to anonymous comments. If there are significant comments, a public meeting is scheduled to discuss the POP. Following the public meeting, the final POP will be advertised with revisions as fiscally feasible.

- 2.) A public hearing will be held at METRA (or another larger accessible City venue, if the anticipated participation is over 80 people) in order to enable riders the opportunity to comment on the proposed fare or service change. The public hearing at METRA (or larger City venue) may last up to six hours in length to allow as many customers the opportunity to comment. Staff may be stationed at the Transfer Center to discuss the proposed change and to receive comments from customers. Staff may also travel on the bus for the purpose of receiving comments from customers.
- 3.) Another public hearing may be held, if warranted, at a designated location outside of METRA (i.e., Plaza of Government Center, Health Department). The public hearing at this location may be held during the evening and last for two hours to allow comments from the general public.
- 4.) All comments from the public will be responded to promptly. In the event there are significant comments against the proposed change, the proposed service change will be revisited by METRA management. A second round of advertisements and public hearings may be required if the service and fare changes are revised.
- 5.) Fare and service changes will be presented to the Metropolitan Planning Organization at the monthly CAC, TCC, and PC meetings.
- 6.) Final recommendations for fare and service changes will receive a citywide public hearing through the City Council public hearing process. All changes will be advertised by the City as part of the Council Agenda for public discussion during the "first reading." Within fourteen days of the "first reading" the fare and service change will go into a second reading. If there is no further discussion, a final vote by the City Council will approve the change. The City Council meetings are aired on the public access channel twice daily until the next regularly scheduled council meeting (7-14 days is typical).
- 7.) Upon approval of Council, signed resolution authorizing the implementation of the recommended fare and service change will be sent to METRA. METRA will proceed to implement the approved changes by providing a minimum of two (2) weeks notification of the enacted change to all customers.